

1 KILPATRICK TOWNSEND & STOCKTON LLP
DENNIS WILSON (Bar No. 155407)
2 DWilson@kilpatricktownsend.com
9720 Wilshire Blvd PH
3 Beverly Hills, CA 90212-2018
Telephone: 310-248-3830
4 Facsimile: 310-860-0363

5 KILPATRICK TOWNSEND & STOCKTON LLP
R. Charles Henn Jr. (admitted Pro Hac Vice)
6 CHenn@ KilpatrickTownsend.com
Charles H. Hooker III (admitted Pro Hac Vice)
7 CHooker@ KilpatrickTownsend.com
Nichole Davis Chollet (admitted Pro Hac Vice)
8 NChollet@ KilpatrickTownsend.com
1100 Peachtree Street, Suite 2800
9 Atlanta, GA 30309-4530
Telephone: (404) 815-6500
10 Facsimile: (404) 815-6555

11 Attorneys for Plaintiff
ADIDAS AG AND ADIDAS AMERICA, INC.

12
13 UNITED STATES DISTRICT COURT
14 FOR THE CENTRAL DISTRICT OF CALIFORNIA

15 ADIDAS AMERICA, INC., a
16 Delaware corporation, and ADIDAS
AG, a German corporation,

17 Plaintiffs,

18 v.

19 SOCCER AND SOCCER, INC., a
20 California corporation, SAGHIR
SPALL, individually and d/b/a
21 SOCCER AND SOCCER, MAPLE
SPORTS INC. a California
22 corporation, PREMIER SOCCER
INC., a California corporation,
23 RICARDO RAMOS, individually and
d/b/a PREMIER SOCCER. GLORY
24 TRADING INC, a California
corporation AND MARIO SPORTS. a
25 California Corporation

26 Defendants.

Case No. CV-13-7148-GW-VBK

**PERMANENT INJUNCTION
AGAINST DEFENDANTS PREMIER
SOCCER, INC. AND RICARDO
RAMOS, INDIVIDUALLY AND D/B/A
PREMIER SOCCER, INC. ON
CONSENT**

27
28 **PERMANENT INJUNCTION AGAINST DEFENDANTS PREMIER SOCCER, INC. AND RICARDO
RAMOS, INDIVIDUALLY AND D/B/A PREMIER SOCCER, INC. ON CONSENT**

1 Having considered the Complaint on file in this action, and Premier Soccer,
2 Inc. and Ricardo Ramos, individually and doing business as Premier Soccer, Inc.,
3 (collectively, “Premier Soccer”) having consented to the terms of the permanent
4 injunction set forth below, this Court hereby finds as follows:

5 1. Plaintiffs adidas America, Inc. and adidas AG (collectively, “adidas”) own and extensively use the Three-Stripe trademark (the “Three-Stripe Mark”),
6 which is covered by valid U.S. Trademark Registration Nos. 870,136, 961,353,
7 1,815,956, 1,833,868, 2,016,963, 2,058,619, 2,278,589, 2,278,591, 2,284,308,
8 2,909,861, 2,999,646, 3,029,127, 3,029,129, 3,029,135, 3,063,742, 3,063,745,
9 3,087,329, 3,183,656, 3,183,663, and 3,236,505. adidas uses the Three-Stripe Mark
10 in connection with footwear and apparel, among other goods.
11

12 2. On September 26, 2013, adidas filed a Complaint claiming, *inter alia*,
13 that Premier Soccer were manufacturing, importing, distributing, marketing,
14 promoting, offering for sale, and selling apparel bearing confusingly similar
15 imitations of adidas’s federally registered Three-Stripe Mark (the “Infringing
16 Apparel”). Photographs of representative examples of the Infringing Apparel are
17 attached as **Exhibit 1**.
18

19 3. Premier Soccer accepted service of the Summons and Complaint, but
20 have not yet filed an Answer or any other pleading in response to adidas’s
21 Complaint.

22 4. On October 25, 2013, the Court entered an order granting adidas’s
23 motion for a preliminary injunction, finding adidas has shown a likelihood of success
24 on the merits of its trademark infringement claims and enjoining Defendants from
25 continuing to infringe adidas’s Three-Stripe Mark.

26 5. The Court has jurisdiction over the subject matter of this action and over
27 Premier Soccer, and venue in this action is proper in this judicial district.

1 Accordingly, **IT IS HEREBY ORDERED** that:

2 1. Premier Soccer and all of their agents, officers, employees,
3 representatives, successors, assigns, attorneys, and all other persons acting for, with,
4 by, through, or under authority from Premier Soccer, or in concert or participation
5 with Premier Soccer, and each of them, are **PERMANENTLY ENJOINED and**
6 **RESTRAINED**, from:

- 7 a. importing, manufacturing, producing, advertising, promoting,
8 displaying, distributing, offering for sale, or selling the Infringing
9 Apparel;
10 b. importing, manufacturing, producing, advertising, promoting,
11 displaying, distributing, offering for sale, or selling any other
12 apparel bearing the Three-Stripe Mark or any other confusingly
13 similar imitation of adidas's Three-Stripe Mark, including
14 without limitation any apparel with one additional stripe (i.e.,
15 four stripes) or less one of the three stripes (i.e, two stripes);

16 2. This Court shall have continuing jurisdiction to enforce the provisions
17 of the permanent injunction entered herein.

18 3. The claims asserted in adidas's Complaint are hereby dismissed with
19 prejudice, with each party bearing its own costs, including attorneys' fees.
20

21 IT IS SO ORDERED this 27th day of March , 2014.

22
23 

24 The Honorable George H. Wu
25 United States District Court
26
27

Presented by:

KILPATRICK TOWNSEND & STOCKTON LLP

Bv: /s/ Nichole Davis Chollet
NICHOLE DAVIS CHOLLET

Attorneys for Plaintiff
ADIDAS AG and ADIDAS AMERICA, INC.

EXHIBIT 1

